

EXHIBIT G

**12/10/15 Letter from
Plum Creek's Counsel B. Ellison**

CAIRNCROSS&HEMPELMANN
524 2nd Ave, Suite 500
Seattle, WA 98104
www.cairncross.com

ATTORNEYS AT LAW
office 206 587 0700
fax 206 587 2308



December 10, 2015

VIA EMAIL

John Donley, P.C.
Kirkland & Ellis LLP
300 North LaSalle
Chicago, IL 60654
john.donley@kirkland.com

Re: W.R. Grace 7A Property Damage Trust Proof of Claim

Dear Mr. Donley:

As you know, Cairncross & Hempelmann represents Plum Creek Timber Co., Inc. ("**Plum Creek**") in its October 7, 2015 submission of a proof of claim to the W.R. Grace 7A Property Damage Trust.

In your response letter dated November 24, 2015, W.R. Grace sought two clarifications in terms of the information Plum Creek had previously provided in its proof of claim. Both clarifications relate to information required by the court-approved Trust Case Management Order ("**CMO**").

First, you request information responsive to categories (M) and (N) of the CMO. Category M requests "*whether any individual asbestos-related property damage lawsuit or claim has been filed against Grace relating to the property for which the Class 7A Claimant is making the claim.*" Category N asks "*whether any individual asbestos-related property damage lawsuit or claim has been filed against any other party relating to the property for which the Class 7A Claimant is making this claim.*"

I believe footnote 9 on p. 3 of our proof of claim responds comprehensively to these two request categories.¹

Second, pursuant to category (P) of the CMO, you seek a list of the periodicals Plum Creek subscribed to in 2002 and 2003. Your letter further circumscribes the list of relevant periodicals to 20 discrete publications. While maintaining that the information sought here is in fact irrelevant, Plum Creek will nonetheless provide the information requested. Based on its internal records, Plum Creek believes that during the specific time period requested (2002-03), it subscribed to (1) USA Today, (2)

¹ Although it was not a "property damage lawsuit," Plum Creek has also been sued by a third-party "relating" to the property for which Plum Creek is making its claim. *Fox v. Plum Creek*, CV-12-2-M-DLC (D. Montana).

December 10, 2015
John Donley, P.C.
Kirkland & Ellis LLP
Page 2

The Wall Street Journal, (3) The Missoulian, (4) Business Week, (5) Forbes Magazine, (6) Fortune, and (7) Money.

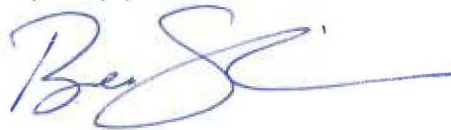
The next issue on our agenda is providing responsive documents and information for W.R. Grace's additional 23 discovery requests by January 8, 2016. Plum Creek stands ready to cooperate and provide this information promptly. Nonetheless, a person with relevant knowledge of the issues in question, Mr. Jerry Wolcott, recently retired from Plum Creek after a long term of service, and is currently conducting a mission for his church in a remote part of the Philippines. We do not have ready access to him.

Moreover, between the filing of Plum Creek's proof of claim and your response letter, Plum Creek announced it was merging with another forestry company.² As you can imagine, merger activities are complicating our ability to promptly provide you with the information and documents you request.

I hope W.R. Grace can reasonably accommodate our limitations in being able to promptly provide the substantial supplemental information now being requested. If W.R. Grace cannot accommodate us, Plum Creek will avail itself of the normal objections to overbroad or burdensome discovery before the Delaware Bankruptcy Court.

I look forward to our scheduled conference call, this coming Friday, December 11, 2015 to discuss these and related matters.

Very truly yours,



Ben Ellison

cc: Rosemary Daszkiewicz
John R. Rizzardi
Deborah Williamson

² See, e.g., <http://www.wsj.com/articles/weyerhaeuser-and-plum-creek-timber-announce-merger-1447016408>.